



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

SEP 23 1991

Mr. John Sweeney
President
Nelson Galvanizing, Inc.
11-02 Broadway
Long Island City, NY 11101

Dear Mr. Sweeney:

This letter will serve to confirm our discussion last Friday, September 20, 1991, regarding the work remaining at your facility, pursuant to the EPA Administrative Order on Consent #II-CERCLA-10206. As per that discussion the following activities remain to be accomplished:

1. pump-out cold spent sulphuric acid from the holding tank and ship for disposal as hazardous waste acid to an approved disposal facility,
2. transfer contents of approximately ten 55-gallon drums of decanted sulphuric acid into emptied cold acid holding tank,
3. ship for disposal approximately 15 55-gallon drums of spent caustic (NaOH) as non-hazardous waste only if pH is less than 12. If the pH is 12, or between 12 and 14 then the caustic must go out as hazardous waste to an approved disposal facility,
4. sample each 55 gallon drum of contaminated iron sulphate salts (approx. 10 drums filled with material shoveled from between tanks), combine individual samples into one container, and take a composite sample of the mixture. This sample should be sent out for full EPA TCLP analysis. Disposal of material will be dictated by analytical results,
5. haul all empty metal and poly drums off-site for disposal or recycling.

As I mentioned on Friday, to avoid any conflict of interest while the Consent Order is in effect, I recommend that M & E do the sampling, and arrange for analysis and disposal, while your employees do the remainder of the manual work.

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I would also strongly urge you to not mix any of the previously excavated soil in with the remaining salts in order to bulk sufficient material to make up truck load. The RCRA regulations specifically bar mixing of waste streams to reduce concentrations of hazardous wastes.

I have already spoken with M & E on the above items and they seem to be in agreement with the above stated approach. I've requested that I be notified of the sampling date so that I can visit the facility and observe the activities. In view of the possibility of a union job action within a few weeks, the above tasks should be completed before the anticipated date of the job action.

If you have any questions, or if your understanding of our discussion is different from mine, please contact me at 908-321-6617.

Thank you for your continued cooperation in this matter.

Sincerely yours,


Paul L. Kahn
On-Scene Coordinator
Response and Prevention Branch

cc: M. Mintzer, 2ORC
B. Deininger, M & E